

March 24, 2003

Re: Damon Corporation 039-16020-00285

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Damon Corporation - Breckenridge
656 N. Delaware
Nappanee, Indiana 46515**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-16020-00285	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 24, 2003 Expiration Date: March 24, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a recreational vehicle assembly plant.

Authorized Individual: Tim Howard
Source Address: 656 N. Delaware, Nappanee, Indiana 46550
Mailing Address: P.O. Box 2888, Elkhart, Indiana 46515
General Source Phone: 574-266-0443
SIC Code: 2451
County Location: Elkhart
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.
- (c) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts.
 - (1) ABS cement applied to drainpipe by brush.
 - (2) AH solvent free floor sealer applied to floors by roller.
 - (3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
 - (4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
 - (5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
 - (6) Spray can adhesive is used for installing fiberglass insulation.
 - (7) Putty tape and caulking are used for windows, doors and trim installation.
 - (8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
 - (9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.

- (10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.
- (d) Ten natural gas fired radiant space heaters (ID#s R10 thru R19), each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19).

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality

Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements

C.6 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a (*temperature or flow rate*), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.11 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate

that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation shall not exceed 1.83 pounds per hour when operating at a process weight rate of 600 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 1-1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this emissions unit and its control device.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1. 1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Control

Pursuant to CP-039-9244-00285, issued on March 30, 1998, the cyclone dust collector (D1) for PM control shall be in operation at all times when the woodworking equipment of Section D.1(a) is being operated.

Compliance Monitoring Requirements [326 IAC 2-5.1-3 (e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the woodworking operation when venting to the atmosphere. An inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the Stack No. D -1 exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during the past of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for the specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.7 Broken or Failure Detection for the Cyclone

In the event that a cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Record Keeping Requirements

- (a) To document compliance with condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 and the dates the vents are redirected.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the cyclone stack exhaust daily.
- (c) To document compliance with Conditions D.1.7, the Permittee shall maintain records of any failed or broken units of the cyclone.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (c) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts.
- (1) ABS cement applied to drainpipe by brush.
 - (2) AH solvent free floor sealer applied to floors by roller.
 - (3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
 - (4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
 - (5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
 - (6) Spray can adhesive is used for installing fiberglass insulation.
 - (7) Putty tape and caulking are used for windows, doors and trim installation.
 - (8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
 - (9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
 - (10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards

D.2.1 Particulate (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the assembly line operation shall not exceed 0.14 pounds per hour when operating at a process weight rate of 12.6 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The total VOC content of materials applied by the various methods in this section to the various assemble parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in

accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water on monthly basis.
 - (a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month.
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each monthly compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.4 Reporting Requirements

A annual summary of the monthly VOC usage to document compliance with Condition D.2.2 shall be submitted by April 15 of each year to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (d) Ten natural gas fired radiant space heaters (ID#s R10 thru R19), each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no applicable requirements for these facilities.

Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section

Company Name: Damon Corporation - Breckenridge
Location: 656 N. Delaware, Nappanee, IN 46550
Permit No.: 039-16020-00285
Source/Facility: Recreational Vehicle Assembly
Pollutant: VOC
Limit: 25 tons per year, based on a 12 month period,
rolled on a monthly basis.

Year: _____

Month	VOC Usage for month (tons)	VOC Usage Previous 11 months (tons)	VOC Usage for 12 month period (Tons)

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Damon Corporation - Breckenridge
Address:	656 N. Delaware
City:	Nappanee, IN 46550
Phone #:	574-266-0924
MSOP #:	039-16020-00285

I hereby certify that **Damon Corp.** is ☒ still in operation.
☐ no longer in operation.

I hereby certify that **Damon Corp.** is ☒ in compliance with the requirements of MSOP **039-16020-00285**.
☐ not in compliance with the requirements of MSOP **039-16020-00285**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. (_____) _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____

INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Damon Corporation - Breckenridge
Source Location: 656 N. Delaware, Nappanee, Indiana 46515
County: Elkhart
SIC Code: 2451
Operation Permit No.: 039- 16020-00285
Permit Reviewer: Walter Habeeb

On January 17, 2003 the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth Newspaper in Elkhart, Indiana, stating that Damon Corporation (Breckenridge) has applied for a Minor Source Operating Permit Renewal to operate a recreational vehicle assembly plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 23, 2003, Damon Corporation submitted comments on the draft of this MSOP Renewal. The summary of the comments and corresponding responses follow (language with strikeout has been omitted and bolded language has been added).

Comment 1: Section B.6 - Annual Notification is unnecessary because we are already required to report VOC emissions.

Response 1: This notification is different than VOC emissions notification and is a requirement for a MSOP permit under rule 326 IAC 2-6.1-5 (5) - (Operating Permit Content) and will remain in the permit.

Comment 2: Section B.11- Annual Fee Payment - please advise if there is a cost for a MSOP renewal and an annual fee.

Response 2: Pursuant to 326 IAC 2-1.1-7(4)(A) (General Provisions: fees)
(4) Annual operating permit fees shall be assessed as follows:
(A) A basic permit fee of two hundred dollars (\$200) shall be submitted upon billing for each operating permit required under 326 IAC 2-6.1.

Comment 3: Section D.1.4 - the woodworking plant has some operations (drills, saws, routers) that are not connected to dust collector (D1) and whose PM emissions do not leave the building but are swept up and disposed of in the trash. Damon suggest that D.1.4 be amended to read " when woodworking equipment connected to the cyclone dust collector (D1) is being operated, the dust collector (D1) shall be in operation".

Response 3: Section D.1.4 will be amended to read as follows: Pursuant to CP-039-9244-00285, issued on March 30, 1998, the cyclone **dust collector (D1)** for PM control

shall be in operation at all times when ~~woodworking is being conducted~~ the **woodworking equipment of Section D.1(a) is being operated.**

Comment 4: Section D.2. - Except for cyclone collector (D1), the plant has no exhaust stacks. The use of aerosol adhesive is done at several locations on the line and PM emissions are fugitive in nature. The use of filters or other control devices is not possible or practical in view of the fact there are no emission points from the plant for these processes. Damon request Section D.2.1 be removed.

Response 4: Particulate (PM) 326 IAC 6-3 for emissions from the process in Section D.2 apply regardless of how emissions might escape, therefore, Section 2.1 will remain. However, it will be changed to more appropriately read as follows.

D.2.1 Particulate (PM) [326 IAC 6-3-2]

~~Pursuant to 326 IAC 6-3-2 (d) (Particulate Emission Limitations, work practices, and control technologies), the spray and other coating operations from the recreational vehicle assembly operations shall comply with the following:~~

~~(a) Surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:~~

- ~~(1) The source shall operate the control device in accordance with manufacturer's specifications.~~
- ~~(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:~~

~~(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.~~

~~(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.~~

- ~~(3) If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.~~

~~(4) Sources that operate according to a valid permit pursuant to any of:~~

~~(A) 326 IAC 2-7;~~

~~(B) 326 IAC 2-8; or~~

~~(C) 326 IAC 2-9;~~

~~are exempt from subdivision (2).~~

- ~~(5) Surface coating manufacturing processes that use less than five (5) gallons of coating per day are exempted as defined in section 1(b)(15) of this rule. At any time the coating application rate increases to greater than five (5) gallons per day, control devices must be in place. A manufacturing process that is subject to this subsection shall remain subject to it notwithstanding any subsequent decrease in gallons of coating used.~~

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate emission from the assembly line operation shall not exceed 0.14 pounds per hour when operating at a process weight rate of 12.6 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

**where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour**

Comment 5: Section D.2.3(a)(2) Record Keeping Requirements - The language in D.2.3(a)(2) requires we keep VOC records on a daily basis. We are required to report our annual and monthly rolling annual VOC emissions. These records should provide compliance assurance to IDEM without trivial paperwork requirements. Damon request "daily" be changed to monthly.

Response 5: Section D.2.3(a)(2) will be changed to read:

(2) The amount of coating material and solvent used less water on a ~~daily~~ **monthly** basis.

Comment 6: Section D.2.3(a)(2)(b) - Damon does not add VOC containing solvent to any coatings in their process and request this section be removed.

Response 6: Tracking of individual solvent usage is necessary to determine the total solvent usage, therefore, Section D.2.3(a)(2)(b) will remain. Damon does not presently add VOC containing solvent to any coatings but they might at a future date.

Comment 7: Damon ask that the requirement in D.2.3(a)(4) to separately record cleanup solvent usage be omitted from the permit because they are already required to record total solvent usage on a monthly basis.

Response 7: Again, tracking of individual solvent usage is necessary to determine the total solvent usage, therefore, Section D.2.3(a)(4) will remain.

Comment 8: In Section D.2.3(a)(6) Damon assumes the term "compliance period" means the rolling 12 month period that must be reported annually, however as used it may refer to a daily, weekly, monthly or annual period. Please explain what the term "compliance period" means.

Response 8: The term "compliance period" means - monthly compliance period as specified in Section 2.2. Section D.2.3(a)(6) will be changed to read:

(6) All records of VOC's emitted for each **monthly** compliance period.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Damon Corporation - Breckenridge
Source Location: 656 N. Delaware, Nappanee, Indiana 46515
County: Elkhart
SIC Code: 2451
Operation Permit No.: 039- 16020-00285
Permit Reviewer: Walter Habeeb

The Office of Air Quality (OAQ) has reviewed an application from Damon Corporation relating to the operation of a recreational vehicle assembly plant.

Permitted Emission Units and Pollution Control Equipment

This stationary source is approved to operate the following emissions units and pollution control devices.

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.
- (c) Two (2) recreational vehicle assembly lines, each line with a maximum capacity of 0.75 units per hour, with the following materials applied by brush, wiping, caulking gun, trowel, spray can and or roller application methods to various assembly parts.
 - (1) ABS cement applied to drainpipe by brush.
 - (2) AH solvent free floor sealer applied to floors by roller.
 - (3) AHB adhesive applied to sheet vinyl and ceramic tile by trowel or caulking gun.
 - (4) Walls are assembled to the frame using brush applied wood glue with a caulking gun used for floor assembly caulking.
 - (5) Seam tape and urethane adhesive (foamseal) is used for ceiling installation.
 - (6) Spray can adhesive is used for installing fiberglass insulation.

- (7) Putty tape and caulking are used for windows, doors and trim installation.
 - (8) Flat roofing and or shingles are installed using caulk gun applied sealer and trowel applied roofing mastic.
 - (9) Brush applied wood glue is used to assemble cabinet carcasses and drawers.
 - (10) Final cleaning of each recreational vehicle is done using a wiping process to apply glass cleaner, mineral spirits, isopropyl alcohol and soap and water.
- (d) Ten natural gas fired radiant space heaters (ID#s R10 thru R19), each with a maximum heat input rate of 0.125 MMBtu per hour and exhausting through its own stack (R10 thru R19).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 039-9244-00285, issued on March 25, 1998; and
- (b) P 039-4086-00285, issued on October 26, 1994.

All conditions from previous approvals were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
D-1	wood cutting	19	1.25	7,300	90
R10,R11,R12, R15,R16,R17, R18,R19	radiant space heaters	22 each	0.33 each	275,000 each	-
R13, R14	radiant space heaters	26 each	0.33 each	275,000 each	-

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that this operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 28, 2002, with additional information received on October 01, 2002.

Emission Calculations

See Appendix A (pages 1thru 6) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	20.25
PM-10	4.75
SO ₂	0.00
VOC	45.27
CO	0.10
NO _x	0.50

HAP's	Potential To Emit (tons/year)
Xylene	0.02
Toluene	0.19
Perchloroethylene	4.67
Hexane	4.63
M.E. Keytone	0.44
TOTAL	9.95

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of each criteria pollutant is less than one hundred (100) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-6-1) of all criteria pollutants are more than ten (10) tons per year and located in Elkhart County. Therefore, the source is subject to the provisions of 326 IAC 2-6. The source was already a State Operating Permit before the renewal application and with the renewal the source is will be a MSOP.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Emissions (TPY)

Pollutant	Surface Coating	Woodworking Operation	Nat. Gas Combustion	Total
PM	2.95	1.70	0.10	4.75
PM ₁₀	2.95	0.17	0.10	3.22
SO ₂	0.00	0.00	0.00	0.00
NO _x	0.00	0.00	0.50	0.50
VOC	45.27	0.00	0.00	45.27
CO	0.00	0.00	0.10	0.10
Total HAP's	9.95	0.00	0.00	9.95
Worst Single HAP	4.67	0.00	0.00	4.67

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 100 tons per year, and it is not in one of the 28 listed source categories.
- (b) These emissions were derived from calculations based on information provided by the source and on Construction and Operation Permit (CP 039-9244-00285) issued on March 25, 1998.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit M-039-16020-00285, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,

- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.
- (c) 40 CFR Part 63 Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), This source is not subject to 40 CFR Part 63 Subpart JJ because this source does not manufacture wood furniture or wood furniture components as defined by Subpart JJ.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 2-4.1-1 (HAP's Major Sources)

This source emits less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of all HAPs, therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4-2 (Fugitive dust emissions: emission limitations)

A source or source generating fugitive dust shall be in violation of this rule ((236 IAC 6-4) if any of the following criteria are violated:

- (a) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (b) If fugitive dust is visible crossing the boundary or property line of a source.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2(c) Particulate Emission Limitations

Pursuant to 326 IAC 6-3-2(c) the PM from the wood cutting operation, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

Interpolation and extrapolation of the data for the process weight rates in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons/hour

The cyclone dust collector shall be in operation at all times the wood cutting operation is in operation in order to comply with this limit.

326 IAC 2-4.1 (Major Sources of Hazardous Pollutants)

This source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit (PTE) of:

- (a) A single hazardous pollutant (HAP) is less than 10 tons per year, and
- (b) Any combination of HAPs is less than 25 tons per year.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This source has agreed to a limit VOC usage to less than 25 tons per 12 consecutive month period. This usage limit makes the requirements of 326 IAC 8-1-6 not applicable.

326 IAC 8-11-3 (Wood Furniture Coating)

This source is not subject to the requirements of 326 IAC 8-11-3 because this source only applies surface coating to interior wood and gypsum walls of manufactured homes and not to wood furniture.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This source is not subject to the requirements of 326 IAC 8-2-12 because this rule applies to cabinet wood parts of the product. There are no coatings applied to cabinets, as the cabinets come pre stained or vinyl wrapped. The rest of the wood in the product that receives coatings is structural wood and not subject to this rule.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This source is not subject to the requirements of 326 IAC 8-2-9 because this rule applies to coating of metal parts and all metal parts for this source are received pre coated.

Conclusion

The operation of this recreational vehicle assembly plant shall be subject to the conditions of the attached proposed Minor Source Operating Permit 039-16020-00285.

**Appendix A: Emissions Calculations
VOC and Particulate**

Company Name: Damon Corporation
Address City IN Zip: 656 N. Delaware, Nappanee, IN 46550
CP: M 039-16020
Pit ID: Pit 00285
Reviewer: Walter Habeeb
Date: Oct. 18, 2002

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Lb VOC/gal solids	Transfer Efficiency
Geocel 2300	8.4	42.00%	0.0%	42.0%	0.0%	22.10%	0.47000	1.500	3.53	3.53	2.49	59.76	10.91	0.00	15.98	100%
Dicore LS502	9.9	33.00%	0.0%	33.0%	0.0%	0.00%	0.22000	1.500	3.27	3.27	1.08	25.90	4.73	0.00	ERR	100%
Bostic Super Tac	5.8	77.50%	0.0%	77.5%	0.0%	17.00%	0.35000	1.500	4.46	4.46	2.34	56.15	10.25	2.53	26.21	15%
Oatey ABS Cem	7.1	75.00%	0.0%	75.0%	0.0%	0.00%	0.01800	1.500	5.31	5.31	0.14	3.44	0.63	0.00	ERR	100%
Brake Cleaner	6.3	74.00%	0.0%	74.0%	0.0%	0.00%	0.02000	1.500	4.68	4.68	0.14	3.37	0.62	0.18	ERR	15%
Bostic Caulk 900	10.1	9.00%	0.0%	9.0%	0.0%	0.00%	0.00400	1.500	0.91	0.91	0.01	0.13	0.02	0.00	ERR	100%
Mineral Spirits	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.33000	1.500	6.47	6.47	3.20	76.86	14.03	0.00	ERR	100%
Glass Cleaner	8.0	10.00%	0.0%	10.0%	0.0%	0.00%	0.01700	1.500	0.80	0.80	0.02	0.49	0.09	0.24	ERR	70%
AH Solvent Sealer	8.6	1.95%	0.0%	2.0%	0.0%	1.95%	0.01300	1.500	0.17	0.17	0.00	0.08	0.01	0.00	8.60	100%
Shingle Tite Mastic	8.1	30.00%	0.0%	30.0%	0.0%	0.00%	0.25000	1.500	2.43	2.43	0.91	21.87	3.99	0.00	ERR	100%
	0.0	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%

State Potential Emissions **Add worst case coating to all solvents** **10.34** **248.06** **45.27** **2.95**

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Damon Corporation
Address City IN Zip: 656 N. Delaware, Nappanee, IN 46550
CP #: M 039-16020
Plt ID: Plt - 00285
Permit Reviewer: Walter Habeeb
Date: Oct. 18, 2002

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene/Diet hylene Glycol	Weight % Perchloroethyl ene	Weight % Ethyl Benzene	Weight % Hexane	Weight % Methylene Bis Iso (MDI)	Weight % M. Ethyl Ketone	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Perchloroethyl ene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	MDI Emissions (ton/yr)	M. Ethyl Ketone Emissions (tons/yr)
Geocel 2300	8.41	0.470000	1.50	0.00%	0.00%	17.98%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	4.67	0.00	0.00	0.00	0.00
AH Sealer	8.6	0.013000	1.50	0.00%	1.95%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00
Bostic Superta	5.75	0.350000	1.50	0.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	4.63	0.00	0.00
Oatey ABS Ce	7.08	0.012500	1.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	75.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.44
Brake Cleaner	6.33	0.020000	1.50	0.00%	21.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.17	0.00	0.00	0.00	0.00	0.00
BosticCaulk90	10.08	0.004000	1.50	7.00%	0.00%	0.00%	1.50%	0.00%	1.00%	0.00%	0.02	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

0.02 0.19 4.67 0.00 4.63 0.00 0.44

Total All HAPs

9.95

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

hapcalc.wb3

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****Company Name: Damon Corporation****Address City IN Zip: 656 n. Delaware, Nappanee, IN 46550****CP: MSOP 039-16020****Plt ID: No. 039-00285****Reviewer: Walter Habeeb****Date: Nov. 13, 2002**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

1.3

11.0

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.5	0.0	0.5

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

gasc99.wb3

See page 2 for HAPs emissions calculations.

update (corrected date) rlm 3/03

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****HAPs Emissions****Company Name: Damon Corporation****Address City IN Zip: 656 n. Delaware, Nappanee, IN 46550****CP: MSOP 039-16020****Plt ID: No. 039-00285****Reviewer: Walter Habeeb****Date: Nov. 13, 2002****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.150E-05	6.570E-06	4.106E-04	9.855E-03	1.862E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.738E-06	6.023E-06	7.665E-06	2.081E-06	1.150E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations(PM and PM 10)
From Wood and Non- Wood Cutting Operations

Company Name: Damon Corporation
Address: 656 N. Delaware, Nappanee, IN 46550
CP: 039-16020
Plt. ID: 039-00285
Reviewer: Walter Habeeb
Date: Nov. 13, 2002

Facility Description

- (a) Woodworking and cutting equipment with a maximum wood processing rate of 600 pounds per hour and connected to cyclone dust collector (D-1).
 - (1) One Vertical Panel saw.
 - (2) One Whirlwind Cutoff saw.
 - (3) One Table saw.
 - (4) Two Radial Arm saws.
 - (5) One Double Miter saw.
- (b) Vinyl, metal and plastic trimming operation with a maximum processing rate of 0.64 pounds per hour and not attached to a control device.
 - (1) Three Miter saws.
 - (2) Three Band Saws.
 - (3) Three Chop saws.

Potential Emissions

- (a) For wood cutting operations that are attached to a control device.
 - (1) The following calculations determine the PM emissions from the wood cutting operations attached to cyclone (D-1), based on the amount of dust collected:
 - Given: Eff, collection (%) = 90.0 %
 - E, collected (TPY) = 15.5
 - Equation: $\text{Eff, collection (\%)} = (\text{Ebc} - \text{Eac}) / \text{Ebc}$
 - E, collected (TPY) = Ebc - Eac
 - Emissions PM, bc (TPY) = E, collected / Eff, Collection = 17.2
 - Emissions PM, ac (TPY) = Emissions PM, bc x (1-Eff, collection) = 1.7
 - (2) The following calculations determine potential PM10 emissions:
 - Emissions PM10, bc (TPY) = 0.1 x Emissions PM, bc (TPY) = 1.7
 - Emissions PM10, ac (TPY) = 0.1 x Emissions PM, ac (TPY) = 0.17
- (b) For trimming operations, other than wood cutting, the potential emissions are negligible since the type of dust created is not "airborne".

Allowable PM Emissions (to determine compliance with 326 IAC 6-3-2)

P = 0.3 Ton/hr (600 lb/hr)

Limit (lb/hr) = $4.1 \times (P^{0.67}) = 1.83 \text{ lb/hr (allowable)}$

Total potential emissions from all operations (TPY) = 1.7 (Wood working) + 2.95 (Solvent, Adhesive, etc. operations) + 0.1 (Space Heaters) = 4.75 TPY = 1.08 lb/hr (will comply)

Appendix A: Emission Calculations

Page 6 of 6 TSD App A

Company Name: Damon Corporation
Address City IN Zip: 656 N. Delaware, Nappanee, In 46550
MSOP: 039-16020
Plt ID: No 00285
Reviewer: Walter Habeeb
Date: Nov. 13, 2002

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking Operation	Nat. Gas Combustion	Total
PM	2.95	17.20	0.10	20.25
PM10	2.95	1.70	0.10	4.75
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.50	0.50
VOC	45.27	0.00	0.00	45.27
CO	0.00	0.00	0.10	0.10
Total HAPs	9.95	0.00	0.00	9.95
Worst Case Single HAP	4.67	0.00	0.00	4.67

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking Operation	Nat. Gas Combustion	Total
PM	2.95	1.70	0.10	4.75
PM10	2.95	0.17	0.10	3.22
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.50	0.50
VOC	45.27	0.00	0.00	45.27
CO	0.00	0.00	0.10	0.10
Total HAPs	9.95	0.00	0.00	9.95
Worst Case Single HAP	4.67	0.00	0.00	4.67

Total emissions based on rated capacity at 8,760 hours/year, after control.